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<p>Review of the October 2017 (revised) Remedial Investigation Report for the Former Manufacturing Plant Area Sherwin- Williams/Hilliards Creek Superfund Site - Operable Unit 2 (Soils) Administrative Order Index No. II CERCLA-02-99-2035</p> <p>The U.S. Environmental Protection Agency (EPA) and New Jersey Department of Environmental Protection (NJDEP) have reviewed the revised October 2017 Remedial Investigation Report (RIR) for soils and soil gas at the Former Manufacturing Plant (FMP) area, including environmental media collected from a portion of Hilliards Creek and are including the following comments (Enclosed). The FMP area is part of the Sherwin-Williams/Hilliards Creek Superfund Site (site), located in Gibbsboro, New Jersey. Contaminated soils and other environmental media (discussed previously) are the second Operable Unit (OU), or OU2 for the site.</p> <p>In accordance with the Administrative Order on Consent, Section VII, paragraph 27, the comments shall be incorporated into the final RIR and provided to EPA within 30 days from receipt of this letter. In addition, EPA is directing Sherwin-Williams to provide a red-line-strikeout copy for clarity and ease of review.</p>		
General Comments		
1	EPA is directing Sherwin-Williams to present the average XRF results (for soil samples) for each of the sub areas (i.e., 6 East Clementon, Main Plant Area, etc.). Information to be included on figure: a) average XRF reading for arsenic and lead only; b) sample number and/or "trench number" c) date; and d) applicable depths. Average XRF readings were previously presented in RI Work Plans/reports and had been presented in each of the different RI Reports for the Dump and Burn sites, as well as the "Residential" Operable Unit.	Figures presenting the XRF results with the specified information have been prepared for each subarea and are presented in the RIR as figures 16A – 16F.
2	Figure 20 (6 East Clementon Road Subarea Soil Samples - Exceedances) currently presents a series of samples (MPSB0089 - MPSB0095), which underwent no laboratory analysis. Yet, these sample locations are depicted on Figure 20 as "not exceeding" NJDEP RDCSRs. There are, however, average XRF readings. EPA is directing Sherwin-Williams to remove locations MPSB0089 - MPSB0095 from Figure 20 and include them in the figures to be created for average XRF readings only (discussed above in Comment #1). EPA is also directing Sherwin-Williams to remove any other soil sample location, which did not undergo any laboratory analysis, from the other subarea figures and (as discussed previously), present any XRF readings on (new) separate	<p>MPSB0089 – MPSB0095 have been removed from Figure 20. These locations, and all other locations at which XRF screening was conducted but did not undergo laboratory analysis, have been added to the XRF-only figures (16A – 16F).</p> <p>At EPA's direction, the soil data from the shallow and intermediate soil and groundwater sampling program have been assigned a unique symbol to allow differentiation from other sampling locations.</p>

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	<p>figures. EPA is directing Sherwin-Williams to revise existing figures, such that any depicted location, which did not undergo laboratory analysis, be removed from the figure. If lacking analytical data, but a location underwent XRF screening, it will be addressed by item #1 above. EPA is also directing Sherwin-Williams, to color code (separately) any soil sample location collected during the shallow and intermediate soil sampling program.</p>	
3	<p>Table 3 - There are a series of sample locations and associated data not presented in Table 3. Many of these sample locations are either depicted in the various figures, or are discussed throughout the RI text. Specifically, soil sample locations: MPSB0157- MPSB0179; MPSB0182; MPSB0184; MPSB0187; and MPSB0233 - MPSB0286 appear to be missing from Table 3. EPA is directing Sherwin-Williams to revise Table 3 such that this data is provided. If there is some rationale for not presenting any data, this needs to be discussed with EPA, prior to revising the FMP RI Report.</p>	<p>The Table 3 data in question were reviewed. Please note the following:</p> <ul style="list-style-type: none"> a) MPSB0157 is included in Table 3. b) MPSB0158 – MPSB0178 are membrane interface probe (MIP) borings for which there are no laboratory or XRF analytical data. At EPA’s direction, text has been added to the RIR specifying that no laboratory analytical data were collected from these locations. c) MPSB0179, MPSB0182, MPSB0184, MPSB0187 were soil borings that were converted to monitoring wells, with no analytical data collected. d) There is no location MPSB0233; this sample designation was skipped. e) MPSB0234 – MPSB0286, except for the samples referenced in (f), below, are included in Table 3. Since they were soil borings associated with the U.S. Avenue residential sampling program, they have been shown under the “RS” designation, which follows the “MP” designation in Table 3. A review of Section 4.5 will show that these are the only locations cited in the comment that were discussed in the text.

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		f) Locations MPSB0249 – MPSB0251 and MPSB0265 – MPSB0273 are borings from the U.S. Avenue residential property historic fill investigation that EPA has previously directed Sherwin-Williams to remove from the RIR.
4	Figures 24 and 26 (Former Resin Plant/Tank Farm A and Seep Area - respectively) present two different methods of presenting sample locations where the "non-detect result is greater than the respective NJDEP RDCSRS." EPA is directing Sherwin-Williams to use the "color code" method, as depicted in Figure 24. EPA is also directing Sherwin-Williams to update Figure 26 to include any of the 2017 soil data and also create figures (if applicable) for other subareas where either the VOC and/or SVOC reporting limits exceed the NJDEP criteria.	<p>Pursuant to direction from EPA on January 23, 2018, the revised figures show locations where the detection limits exceed the RDCSRS for the primary constituents of concern at the FMP.</p> <p>Color-coding has been added to all applicable figures indicating an instance where ND RL > Criteria at a particular sample location; plus a note has been added to the legend/notes that the blue text within the results box indicates a non-detect reporting limit that exceeds NJDEP RDCSRS.</p> <p>This dual approach uses the color-coding to key in to the sample location and the blue text highlights the RL at the specific sampling interval for that location.</p> <p>All applicable figures have been updated to include 2017 soil sampling locations, except for those locations where a mid-screen soil sample deeper than 20' bgs was collected in conjunction with a soil boring that was converted to a monitoring well.</p>
5	In addition to updating Table 3, as discussed in General Comment #3, EPA is also directing Sherwin- Williams to create a separate table with just the soil samples that were collected as part of the "shallow and intermediate" groundwater screening effort (2012).	The requested data are included as Table 3A (All Analytes) and Table 4A (Hits Only).
6	EPA is directing Sherwin-Williams to remove Figure 16 and to also delete the last paragraph and two bullets (associated) with Section 4.4. Overall, EPA is in general agreement of Sherwin-Williams approach of using "lines of evidence" to approximate the vertical and horizontal	Figure 16 and the cited paragraph have been removed.

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	<p>extent of "free product". However, Sherwin-Williams' assessment of the residual petroleum product delineation fails to include: VOC and SVOC total and/or individual TIC concentrations, instances of elevated reporting limits causing a "non-detect value" exceeding NJDEP RDCSRs; and an assessment of Flame Ionizing Detector (FID) results (where available). While EPA is directing Sherwin-Williams to remove Figure 16 and associated text in Section 4.4; EPA does agree with the general "observation" (not "conclusion") that residual petroleum is not uniformly distributed either horizontally or vertically and that (in general) field screening technologies (i.e., PID readings) may not always be indicative of exceedances of criteria.</p>	
7	<p>EPA acknowledges the effort by Sherwin-Williams to discuss the complex nature of "product" (also referred to as residual petroleum product, "degraded mineral spirits, etc."), which not only includes target compounds (i.e., benzene, naphthalene, etc.) but also includes detectable concentrations of VOC and SVOC TICs. Using "lines of evidence", Sherwin-Williams constructs an approach (based on laboratory data and on field-screening techniques) to present the horizontal and vertical extent of the residual petroleum product present at the FMP area. EPA largely agrees with the approach utilized and presented in the revised RI report. However, EPA is uncertain whether it was the intention of Sherwin-Williams to infer that TICs, other than those classified by Sherwin-Williams as being "product-related", to be non-site-related. To be clear, it is EPA's position that, where VOC and SVOC TICs are present at concentrations well above concentrations found elsewhere in the FMP area or at the other Sherwin-Williams sites, EPA does consider such TICs (either those considered to be: plant-related, PAH-related, or "unknown") to be "site-related". EPA is not seeking that either Appendix S, or the current text (with the exception of any specific comments later in this letter) be revised.</p>	<p>The comment is acknowledged.</p> <p>Appendix S was not intended to definitively state that TICs that could not be readily classified were not product-related. It was intended, based on available information, to categorize the TICs so that a qualitative evaluation of the TIC composition in the samples could be made. As noted in Appendix S, a large number of the individual TICs were unable to be classified.</p> <p>As EPA is aware, there are no NJDEP soil cleanup criteria for TICs, but there are both interim specific and interim generic Groundwater Quality Standards (GWQS) for synthetic organic compounds. Therefore, the presence of the TICs, unless a potential source of groundwater contamination, does not trigger a soil cleanup.</p> <p>Please note that Appendix S has been revised to include the results of conversations with the analytical laboratory director documenting that DAA was found as an aldol condensation product in the method blanks, and the results of and evaluation of the laboratory QA/QC packages for all samples where DAA</p>

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		was found at concentrations of 30 mg/kg or greater that also identified DAA as a laboratory contaminant.
8	Ensure that all Figures, Tables, and Text reflect any of the applicable 2017 updates to the NJDEP RDCSRS, and amend as necessary.	The 2017 updates to the NJDEP RDCSRS have been incorporated.
Specific Comments		
1	Page ES-5 - Last sentence on page, in lieu of using the term "Work", EPA is directing Sherwin-Williams to use the term, "Field activities".	The text has been revised.
2	Page ES-9 - Paragraph on VOC and SVOC TICs - Correct typo, replace "TOC" with "TICs".	The text has been revised.
3	Page 1-15 - EPA is directing Sherwin-Williams to remove the second sentence (in entirety) from the third paragraph. In addition, same page, last paragraph on page, correct the term "issue" to "issued".	The text has been revised.
4	Page 1-32, Section 1.3.1.2 - The document states, "A copy of the Incident Report is provided with the included CD attached to this RIR." The document should be revised to reference the appropriate Appendix where this Incident Report is located.	The text has been revised, and the Incident Report is included in Appendix N.
5	Page 2-3 - (Last paragraph on page) - EPA is directing Sherwin-Williams to remove the second sentence from the paragraph.	The text has been revised.
6	Page 2-3 (Bottom of page) - EPA is directing Sherwin-Williams to include a brief discussion (sentence or two) regarding the EPA (date) approved HHRA (which addresses human exposure to: soil, sediment, VI, etc.) and the recently submitted (draft) BERA for ecological exposure.	A brief discussion of the HHRA and BERA has been included in Section 2. Section 2.3 refers only to the FMP Strategic Sampling, and data from other sampling events were used in the HHRA and BERA.
7	Page 2-4 - Item #2 - EPA is directing Sherwin-Williams to remove the second and third paragraphs.	The text has been revised.
8	Page 2-11 - Second paragraph, it is stated that the results of the XRF screening are available on Figure 4, but the correct figure is Figure 10. Please correct.	The text has been revised.
9	Page 2-13 - Last paragraph on page, first sentence. For clarity purposes, EPA is directing Sherwin-Williams to include the following information: "EX1 - EX4", after the statement, "Four separate test pits."	The text has been revised.
10	Page 2-15 - EPA is directing Sherwin-Williams to replace the second paragraph with the following text, "The excavation for T-60 extended to a depth of approximately 6' bgs. An unknown pipe (approximately 8	The text has been revised.

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	inches in diameter) was discovered during excavation activities at a depth ranging from 2' to 3' bgs. The terminus of the pipe is unknown".	
11	Page 2-20 - EPA is directing Sherwin-Williams to remove any and all references to the following: a) no EPA trip report was provided to Sherwin-Williams and b) the scope of work performed by ERT was unknown. Regarding the trip report, EPA RPM Ray Klimcsak has a 7/29/15 email from Mary Lou Capichioni (Sherwin-Williams) which confirms that EPA, was sending a CD which included the Trip Report. Regarding the Scope of Work to be performed, EPA RPM Ray Klimcsak has an email (2/12/15) from colleague, John DiMartino, which indicated that Rachel Vocaire (Sherwin-Williams) had commented on the draft EPA-ERT Work Plan and QAPP.	The text has been revised. Please note that the original text was factual; no trip report was provided to Sherwin-Williams as no trip report was prepared by EPA. The original text was included to document that, with no trip report, Sherwin-Williams was unable to provide a description of the sampling that was conducted. Elements of a trip report, including a figure, boring logs, core photos, data and chain of custody forms, were provided to Sherwin-Williams in January 2018.
12	Page 2-22 - Section 2.9, last full paragraph, it is stated that access had not been granted to Property E-1. Please correct this. At the time of the revised (October 2017 RI Report) sampling had been performed at Property E-1 during the summer of 2017.	The text in Section 2.9 has not been revised as this section discusses the 2015 soil sampling, and, at that time, access had not been received. Section 2.11, which discusses the 2017 U.S. Avenue soil sampling, has been added to the text, and notes that samples were collected on Property E-1. The text in the introduction to Section 2 has also been revised to reference the new Section 2.11.
13	Page 4-27 - Remove reference that "DAA" is a laboratory artifact.	The text has been revised to state that DAA was found as a laboratory contaminant, but that it could have also originated at the FMP.
14	Page 2-28 - EPA is directing Sherwin-Williams to remove the first sentence, following the bullets, at the top of the page. The figures and tables within the Trip Report reflects data for 11 sub-slab samples are included. Note, out of 10 sub-slab locations, one included a duplicate sample, hence 11 sub-samples from 10 locations.	The text has been revised. Please note however, that in the text for "SERAS Mobilization Two", the mobilization for the July 29, 2015 sampling event, it is stated that, "...ten SUMMA® canister 3-hour soil vapor samples...were collected....". It is acknowledged that the tables and figures present data for eleven samples, but there is no reference in the text to the eleventh. Therefore, the RIR text included the statement that eleven samples were collected by the EPA to prevent any confusion between the RIR and the Trip Report.

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15	Page 2-30 - Section 2.11.7 - Provide EPA with a figure that depicts Suites A and B/C for 4 Foster Ave, as it not readily apparent where such a figure exists in Appendix P.	A figure depicting the various suites comprising 4 Foster Avenue may be found in Appendix P – Sump Depressurization and Venting Report – August 2016.
16	Page 3-2 - Section 3.2 - Provide date, or date ranges, of the aerials (in Appendix A) which supports the statement that fill was placed in the area of the current 7 Foster Ave. building.	The text has been revised to cite the 1951 aerials in Appendix A where fill areas are noted.
17	Section 3.3, Page 3-3 third paragraph - Reference to the Burn Site is made, but EPA believes it should have been the FMP area. If so, correct. In addition, please ensure the corrected statement is accurate (in terms of geological formations).	The text has been revised.
18	Page 4-1 - Section 4.0 (First paragraph) - Sampling activities within Silver Lake are discussed. As this is the first time that Silver Lake is discussed, in the context of data being collected, please either remove the reference (since associated data/figures are not provided), or keep the statement that samples were collected from Silver Lake, but that Silver Lake and associated data will be assessed in a future Operable Unit.	The text has been revised.
19	Page 4-2, Section 4.1, Top of page - It is stated that, "In some instances, soil sampling was conducted, or samples of discolored material were collected and analyzed." According to Figure 10, samples were generally screened with the XRF for average arsenic and lead concentrations. EPA is directing Sherwin-Williams to remove this statement, or provide specific samples of when samples of discolored material was sent to the laboratory for analyses.	The text has been revised. Please note that the text was not intended to imply that laboratory analyses were conducted. Rather, as noted in the comment, XRF analyses were conducted on select samples.
20	Page 4-6, bottom - EPA is directing Sherwin-Williams to revise the following statements: "Due to their locations in U.S. Avenue and Berlin Road, there was no ability to further investigate Targets T-56, T-57 and T-58. However, based on further evaluation of the original geophysical results, it was concluded <u>It's possible</u> that these features are likely associated with the roadway and any utilities that are present in the right of way."	The text has been revised.
21	Page 4-7 - Top of page, EPA is directing Sherwin-Williams to remove the term "concluded", as without trenching activities, there is no way to confirm the statement that it can be concluded.	The text has been revised as directed in Specific Comment #20. There are no additional instances on pages 4-6 or 4-7 where the term "concluded" was used.

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22	Page 4-7 - Section 4.1, discussion on "Utilities" - It is stated that identities of detected utilities were based on (among other items) knowledge of local personnel. As the former plant area has been developed since 1850 - present; with Brandywine being the most recent owner/operator, if it was meant to say that Brandywine has provided Sherwin-Williams with information (and if this can be supported), then it should be specifically stated that it is Brandywine personnel who provided such information.	The text has not been revised to note that information was provided by both Brandywine and the tenants occupying the property at the time of the investigation.
23	Page 4-9 - Discussion of product "make up" includes percentages for xylenes and naphthalene, but includes "ppm" concentrations for benzene. EPA, for purposes of being able to compare to xylene and naphthalene, is directing Sherwin-Williams to provide the percentage "value" for benzene.	The text has been revised. Please note that the "percentage" value for benzene was not originally included because the benzene content of the LNAPL is very low (15 – 91 mg/kg) which equates to 0.0015 – 0.0091 percent.
24	Page 4-9, Section 4.3 - Review of the Appendix R laboratory data packages indicates that the data included in the table on Page 4-9 is incomplete as it does not quantify total volatile organic compounds (VOCs) and semi-VOCs tentatively identified compounds (TICs) which are primary components of LNAPL. A review of the October 2014 data package indicates, that for Product Sample H3P-PR-AI-R2-0, total SVOCs TICs were detected at concentrations exceeding 100,000 mg/kg and total VOC TICs were detected at concentrations exceeding 20,000 mg/kg. The Department acknowledges that further discussion of VOC and SVOC TICs is provided in Section 4.5.8, however, since VOC and SVOC TICs are a primary component of the LNAPL product, additional information should be included in Section 4.3 and the embedded summary table should be revised for clarity.	<p>The table has been titled "LNAPL Target Compound Content" to clarify its purpose.</p> <p>Please note that the table was intended to document the concentrations of target analytes in the LNAPL, not document the total composition of the LNAPL. This is stated in the fourth paragraph of Section 4.3, which introduces the table and says, <i>"The three analyses also provide an understanding of the target analyte content of the residual petroleum product."</i></p> <p>The table was prepared in response to EPA General Comment #6 on the October 2017 RIR that in part stated, <i>"EPA is requesting that the RI text be modified to address the fact that the "product" is comprised of high concentration of constituents, not low concentrations of constituents."</i> The table was created to quantitatively document the target compound content of the LNAPL. As shown in the table, target analyte compounds comprise, at most, 1.3% of the LNAPL.</p>

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		If 1.3% of the LNAPL is comprised of target compounds, 98.7% of the LNAPL must be non-target compounds, which would be both TICs (approximately 12% in the October 2014 analysis) and the general category of "petroleum hydrocarbons". As noted in the third paragraph of the section, the extractable petroleum hydrocarbon (EPH) component is primarily lighter (C9 – C12) aliphatic (straight chain) hydrocarbons.
25	Figure 15 - EPA is directing Sherwin-Williams to verify all locations which are intended to depict "MIP/LIF locations indicating presence of product impacted soils" .	Figure 15 has been revised to show only those MIP/LIF locations where there was an indication of the presence of product.
26	Figure 20 - EPA is directing Sherwin-Williams to remove soil sample locations: MPSB0072 - MPSB0075 from the figure. These are deep soil samples and not indicative of shallow (less than 12 feet) soils.	The locations have been removed.
27	Page 4-10 - Typo, "EPA" is specified, instead of "EPH".	The text has been revised.
28	Page 4-11, Section 4.4 (and Executive Summary, Page ES-5) - The document states, "Based on the PID readings, where present, the residual petroleum product is typically first encountered at, or immediately above, the water table. In the former Tank Farm A area, this is approximately 8 to 10 feet..." The Department acknowledges that the document provides a detailed discussion on the potential horizontal extent of the product plume, however there is limited information regarding its vertical extent. In addition, though Figures 14B, 14C, 14E and 16 provide some visual depictions of the vertical extent of product based on the PID readings, the Department finds that the majority of soil samples were targeted to the smear zone, such that there is limited characterization of vadose zone soils to support the above statement. In addition, further review of information presented in the document (i.e. boring logs, PID readings, VOC and SVOC TICs data) indicate that in Tank Farm A, product-impacted soils are present at shallower depths than suggested (i.e. 4 to 5 feet below ground surface (ft. bgs) and are encountered extending down into water table at depths greater than 10 ft. bgs in some locations, as noted in select borings below:	<p>The comment is acknowledged, and language has been added to note that there are exceptions to the general observation that the LNAPL is typically first encountered at the top of the water table. This language has also been added to the Executive Summary.</p> <p>Please note that the text states, <i>"While the UV/LIF and the soil sampling results can be considered more definitive indicators of the presence of the residual petroleum, only seven UV/LIF borings were installed, and samples for TPH/EPH laboratory analysis were not consistently collected throughout the soil column in every boring."</i> Therefore, Sherwin-Williams is in agreement with the assertion that the MIP/LIF and laboratory analytical data, where available, provide a more definitive understanding of the vertical distribution of the LNAPL, than do the PID/FID results.</p>

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	<ul style="list-style-type: none"> PWSB0016: Boring log referenced stained product from 4.5 ft. bgs to the water table at 11.5 ft. bgs; PID readings were not reported to be elevated. MPSB0013: VOC TICs over 5,000 mg/kg at 6.5 ft. bgs; elevated PID readings (ranging from ~ 1,400 to 5,800 ppm) from 5 ft. bgs to the water table at 15 ft. bgs. MPSB0014: VOC TICs over 2,400 mg/kg at 2 ft. bgs increasing with depth; elevated PID readings (~1,050 to 4,100 ppm) from 5 ft. bgs to the water table at 11 ft. bgs. MPSB0017: Elevated PID readings > 1000 ppm from 6 ft. bgs to the water table at 9.5 ft. bgs and deeper. MPSB0183: VOC TICs over 28,800 mg/kg at 7.5 ft. bgs; elevated PID readings (over 2,240 ppm) at 4.5 ft. bgs and extending to water table. 	<p>However, the PID results are a much more comprehensive dataset.</p> <p>It is also acknowledged that there are locations, such as those cited in the comment, where the PID results or other lines of evidence support an observation that the LNAPL is present at a depth shallower than the top of groundwater, but these are outliers from the overall trend of LNAPL behavior at the site. The text uses the term "<i>typically</i>" in describing the vertical distribution of the LNAPL. Typically, the LNAPL is first encountered at the top of groundwater, and it does extend into the saturated zone.</p>
29	Page 4-12 - EPA is directing Sherwin-Williams to revise the sentence at the top of the page to the following: "The figure is consistent with the discussion of the <u>approximate</u> vertical extent presented above, but also supports two other conclusions <u>observations</u> ."	Please note that EPA General Comment #6 directed Sherwin-Williams to remove this text. Therefore, this comment is no longer applicable.
30	Page 4-15 - Bullet on top of page, is missing "M" in MPSB "sample" number.	The text has been revised.
31	Page 4-16 - First paragraph, cites the RDCSRS for benzo(a)pyrene as 0.2 mg/kg. Please use the updated values.	The text has been revised.
32	Page 4-17 - Third bullet discusses sample location SGW-278. EPA is directing Sherwin-Williams to remove any reference to this pre-RI sample. Delineation (nature and extent) should be based on RI data.	The text has been revised.
33	Page 4-17 - EPA is directing Sherwin-Williams to remove the following statement from the "fourth bullet on page". "The low levels of PAHs and PCBs found beneath the parking areas northeast of the 6 East Clement building slab are, at a maximum, bounded further to the northeast by Silver Lake. If a remedy other than containment and ICs is determined to be applicable to this area, additional data can be collected as part of a PDI. "	The text has been revised.
34	Page 4-18 (Main Plant Area) - Figure 22 and the associated text in Section 4.5.3 do not accurately present the results for lead at soil	Locations MPSB0087 and MPSB0088 have been removed from Figure 22 and included in the XRF-only

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	sample locations MPSB0030 and MPSB0031 where both were consistently rejected ("R") at each interval. In addition, soil sample locations MPSB0087 and MPSB0088 are indicated as being "below RDCSRS criteria", however, no laboratory analysis was performed on these samples. These two locations were screened with an XRF and there were instances of either lead and/or arsenic exceeded the NJDEP RDCSRS. EPA is directing Sherwin-Williams to remove these two locations from Figure 22 and place the samples on a "new" figure, as discussed in General Comment #2. EPA is directing Sherwin-Williams to transparently present the fact that data was rejected (for lead) for soil sample locations MPSB0030 and MPSB0031.	figure. The text boxes for MPSB0030 and MPSB0031 have been revised to note that the lead results were rejected. Please note that the text does not reference MPSB0030, MPSB0031, MPSB0087 or MPSB0088 as these locations are not relied upon for delineation purposes.
35	Page 4-21 - (Second to last paragraph, last sentence) - EPA is directing Sherwin-Williams to remove the last sentence of the paragraph. Soil sample MPSB0109 cannot be used to define contaminant delineation, because the reporting limits (for VOCs) are above the NJDEP RDCSRS (at the 7.5 - 8.5 - foot interval), where VOC total TIC concentrations were above 5,000 ppm. Soil sample location MPSB0113 was collected during the shallow and intermediate groundwater/soil screening effort (2012). The intervals for soil sample location MPSB0113 are from: 19.5 - 20.0 and 29.5 - 30.0. These depths provide vertical delineation, but not horizontal, as they were likely collected below the depth of impacted soil. MPSB0018 was collected in close proximity to MPSB0109 and MPSB0113 and exhibited high concentrations of naphthalene (nearly 10 times the NJDEP RDCSRS). It is likely that further horizontal delineation will be needed to the west of this area during remedial design activities.	The text has been revised.
36	Page 4-22 - Last paragraph of Section 4.5.5, second sentence. EPA is directing Sherwin-Williams to revise the sentence to state: "These borings are located outside the northwest corner of the Burn Site fenced area."	The text has been revised. Please note that "northwest" has been replaced by "north" as it is more accurate.
37	Page 4-23 (last paragraph) and Figure 27 - The document states, "One or more individual PAHs are found at concentrations greater than the RDCSRS...at locations MPSB0049, MPSB0058, and MPSB0068." However, Figure 27 does not reference an exceedance of for boring	The text has been revised.

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	MPSB0068. Please confirm if PAHs were detected above the updated RDCSRS at MPSB0068 and revise the text and figure accordingly.	
38	Page 4-23 (last paragraph) and Figure 27 - The document states, "Additionally, benzo(a)pyrene was detected at concentration greater than the RDCSRS ... at MPSB0057 ... " However, Figure 27 indicates "no exceedances" at boring MPSB0057. Please clarify if benzo(a)pyrene was detected at MPSB0057 above the updated RDCSRS and revise the text and figure accordingly.	The text has been revised
39	Page 4-27 - EPA is directing Sherwin-Williams to remove the last sentence in Section 4.5.8.	The text has been revised as discussed with EPA to state that in addition to being a laboratory contaminant, the DAA could also have originated at the FMP.
40	Page 4-28 (Section 4.5.8.2) - EPA is directing Sherwin-Williams to discuss, in brief detail, the several sample locations (MPSB0033, MPSB0140, MPSB0141 and PWSB0023) which are all in close proximity to one another, as another location where elevated TIC concentrations exist in the "Main Plant" subarea.	The text has been revised.
41	Page 4-29, Section 4.6, 2nd Sentence: Please note that elevated Aroclors were also found in sediments, in addition to metals and PAHs, above the respective ESC as shown on Figures 18 and 31.	The text has been revised. Please note that Figure 18 presents only soil data, and those results are compared to the RDCSRS.
42	Page 4-31 (Surface Water) - Attachment 1 (Response to EPA's comments), Specific Comment #49 stated that Sherwin-Williams was to add some text regarding detection limits for pentachlorophenol. However, no text was noted. Please revise and incorporate text.	The text has been revised.
43	Page 4-35 and Figure 12A (May 2008 EPA Sampling) - This section summarizes vapor intrusion (VI) samples collected in May 2008 in select commercial buildings on-site. However, Figure 12A and Table 9 include VI data from several residential properties (Unit 001 to Unit 008) sampled in May 2008. The document should clarify that residential VI data is not summarized in this RIR though it may be referenced on the associated Table and Figure.	The samples collected from the residential properties have been removed from Figure 12A and Table 9. Language has been added stating that the results of the residential sampling were presented in the Residential Properties RIR and are not discussed in this RIR.
44	Page 4-35 and Figure 12B (December 2008 EPA Sampling) - This section only summarizes VI samples collected in December 2008 in select commercial buildings on-site. However, Figure 12B and Table 9 include data from one residential property (i.e. Unit 010) sampled at the same	The samples collected from the residential properties have been removed from Figure 12B and Table 9. Language has been added stating that the results of the residential sampling were presented in the

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	time. As noted above, the document should clarify, that residential property VI data is not summarized in this RIR though it is included on the associated Table and Figure.	Residential Properties RIR and are not discussed in this RIR.
45	Page 4-40 - Section 4.9.14 - It is stated that methane was not detected during any sampling event at a concentration approaching 10% of the LEL. Earlier in the draft RI (page 4-37) it is stated that percentage LEL measurement from ports in the 2 and 4 Foster Avenue and 3 U.S. Avenue buildings were 100%. If there is a location, other than a sub-slab port, where the "Monthly Methane Monitoring" data is collected, this should be clearly presented in the RI Report.	<p>The reviewer is directed to Section 2.12.11 (previously 2.11.11) in which the scope of the methane monitoring program is described. Additional information describing the scope of the methane monitoring program has been included, and a figure showing the monitoring locations has been added to Appendix P.</p> <p>Please note that Section 4.9.14 refers to the monthly methane monitoring activities in which indoor air samples, not sub-slab samples, are collected. The text stating that methane concentrations measured during these events have not approached 10 percent of the LEL is correct. The sub-slab samples referenced previously did contain methane at higher concentrations.</p>
46	Figure 15 - The text in the RIR references 50,000 ppmv. However, the units in the legend for Figure 15 are in ug/m3. Please verify if the correct units were accurately presented on the figure.	The legend on Figure 15 has been revised.
47	Figure 20 - The "chem box" for MSPB0116 is missing. Please add this data point to the figure.	The chem box has been added.
48	Figure 28 - Add sample location MPSB0118 to the Figure, as it is referenced in the RIR as identifying horizontal delineation.	MPSB0118 has been added to Figure 20. Please note that the text does not reference MPSB0118 as providing horizontal delineation. Rather, the text states that MPSB0118 contained pentachlorophenol at 4 mg/kg, greater than the RDCSRS of 0.9 mg/kg.
49	Figure 12A, EPA/ERT VI Investigation, May 2008: Figure 12A presents VI data collected in May 2008 at several commercial and residential properties on or near the FMP. However, the residential property VI data was incorrectly compared to Non-Residential Soil Gas Screening Levels (NRSGSL). Figure 12A should be revised to compare the	The comment is acknowledged. Please note that the residential samples have been removed from Figure 12A and Table 9. Language has been added stating that the results of the residential sampling were presented in the Residential Properties RIR and are not discussed in this RIR.

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	residential properties (Unit 001 to Unit 008) to the appropriate Residential Soil Gas Screening Levels (RSGSL).	
50	Figure 12B, EPA/ERT VI Investigation, December 2008: Figure 12B presents VI data in December 2008 at several commercial and residential properties on or near the FMP. As noted above, the residential property VI data was incorrectly compared to NRS GSL. Figure 12B should be revised to compare the residential property (Unit 0010) VI data to the correct RSGSL.	The comment is acknowledged. Please note that the residential samples have been removed from Figure 12B and Table 9. Language has been added stating that the results of the residential sampling were presented in the Residential Properties RIR and are not discussed in this RIR.